

District Court, Boulder County, Colorado Court Address: 1776 6 <sup>th</sup> Avenue Boulder, CO 80306	
THE PEOPLE OF THE STATE OF COLORADO  v.  Ahmad Alissa, Defendant.	DATE FILED: March 23, 2021 2:47 PM FILING ID: 7364D3DF82B37 CASE NUMBER: 2021CR497  <div style="text-align: center;">σ COURT USE ONLY σ</div>
Megan Ring, Colorado State Public Defender Samuel Dunn #46901 Senior Deputy State Public Defender Kathryn Herold #40075 Supervising Deputy State Public Defender Boulder Regional Public Defenders 2555 55TH Street D-200, Boulder, CO 80301 Phone: (303) 444-2322 Fax: (303) 449-6432 E-mail: boulder.defenders@state.co.us	Case No. 21CR497  Division 13
<b>MR. ALISSA'S MOTION FOR PROTECTIVE ORDER (D-006)</b>	

Mr. Alissa moves this Court for an Order requiring the Office of the District Attorney, any other law enforcement persons, and their agents to (a) get the consent of Alissa's counsel, Deputy State Public Defender Kathryn Herold and Samuel Dunn, before attempting to contact or interview Mr. Alissa and (b) give said counsel reasonable opportunity to be present PRIOR to any contact with Mr. Alissa on the following grounds:

1. The Office of the Public Defender has been appointed to represent Mr. Alissa.
2. Mr. Alissa does not wish to be interviewed, contacted or questioned unless his attorney is present. Mr. Alissa wishes all of his contacts with state agents to take place through his legal counsel.
3. Notification and consent of opposing counsel is required by the Colorado Rules of Professional Conduct, Rule 4.2.
4. Mr. Alissa wishes to exercise both his right to silence (and against self-incrimination) and his right to counsel under the federal and state constitution.
5. Mr. Alissa hereby exercises his right to remain silent and privilege against self-incrimination and right to counsel under the Federal and State Constitutions. People v. Pierson, 633 P.2d 485 (Colo.App. 1981); People v. Pierson, 670 P.2d 770 (Colo. 1983); People v. Cerezo, 635 P.2d 1197 (Colo. 1981); People v. Lowe, 616 P.2d 118 (Colo. 1980); People v. Jones, 677 P.2d 383

(Colo.App. 1983). See also Edwards v. Arizona, 451 U.S. 477, 101 S.Ct. 1880, 68 L.Ed.2d 378 (1981); Massiah v. United States, 377 U.S. 201 (1964); United States v. Henry, 447 U.S. 264 (1980); Maine v. Moulton, 474 U.S. 159 (1985).

MEGAN A. RING  
COLORADO STATE PUBLIC DEFENDER

\_\_\_\_\_/s/Samuel Dunn\_\_\_\_\_  
Samuel Dunn #46901  
Deputy State Public Defender

\_\_\_\_\_/s/Kathryn Herold\_\_\_\_\_  
Kathryn Herold #40075  
Supervising Deputy State Public Defender

**Certificate of Service**

I hereby certify that on \_March 23\_, 2021, I  
served the foregoing document by  
E filing same to all opposing counsel of  
record.  
/s/ Sam Dunn

Dated: March 23, 2021